

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

BENJAMIN CRAIG, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CENTURYLINK, INC., GLEN F. POST,  
III, AND R. STEWART EWING JR.,

Defendants.

No. 3:17-cv-01005-SMH-JPM (Lead)  
No. 3:17-cv-01033-SMH-JPM (Member)  
No. 3:17-cv-01065-SMH-JPM (Member)

Judge S. Maurice Hicks, Jr.

Magistrate Judge Joseph H. L. Perez-Montes

CLASS ACTION

INTER-MARKETING GROUP USA,  
INC., Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

CENTURYLINK, INC., GLEN F. POST,  
III, R. STEWART EWING, JR., and  
DAVID D. COLE,

Defendants.

No. 3:17-cv-01648-RGJ-JPM

Judge Robert G. James

Magistrate Judge Joseph H. L. Perez-  
Montes

CLASS ACTION

**DECLARATION OF F. WILLIAMS SARTOR, JR. IN SUPPORT OF THE MOTION OF  
LEAD PLAINTIFF OREGON FOR CONSOLIDATION OF RELATED ACTION**

I, F. Williams Sartor, Jr., declare as follows:

1. I am a member in good standing of the bars of the State of Louisiana and of this Court. I am a partner in the law firm of Nelson, Zentner, Sartor & Snellings, LLC. I submit this declaration in support of the Motion of Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund (“Oregon”) for Consolidation of Related Action.

2. Attached as Exhibit A is a true and correct copy of the notice of pendency of *Inter-Marketing Group USA, Inc. v. CenturyLink, Inc.*, published October 25, 2017.

3. Attached as Exhibit B is a true and correct copy of Oregon’s proposed language for a corrected notice explaining that the lead plaintiff deadline in the above-captioned related securities class actions expired on August 21, 2017.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed this 21st day of December, 2017.

/s/ F. Williams Sartor, Jr.  
F. Williams Sartor, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, December 21, 2017, I electronically filed the above Declaration of F. Williams Sartor, Jr. in Support of the Motion of Lead Plaintiff Oregon for Consolidation of Related Action using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

/s/ Fred Williams Sartor, Jr.

Fred Williams Sartor, Jr.